



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Division of Drinking Water

March 10, 2015  
Certified Mail/Return  
7012 3460 0003 1113 1793

Willows Mobile Home Community and RV Park  
3511 Del Paso Road  
Sacramento, CA 95835

Attention: Richard Travassos

**Subject: Public Water System No. 1100237 – Citation No. 21-15C-025 for Lead and Copper Rule monitoring violation.**

It has come to our attention that the Willows Mobile Home Community and RV Park water system did not monitor and report lead and copper samples in the year 2014, according to the Lead and Copper Rule (LCR). Consequently, the Division of Drinking Water has issued the enclosed Citation for Noncompliance (Citation) with Title 22 California Code of Regulations, Sections 64675 and 64690.

Please review the enclosed Citation and note directives for corrective action and public notification.

If you have any questions please call Paul Rowe at (530) 224-4866 or contact me directly at (530) 224-4861.

A handwritten signature in black ink, appearing to read "R. Crenshaw".

Reese B. Crenshaw, P.E.  
Valley District Engineer  
DRINKING WATER FIELD  
OPERATIONS BRANCH

Enclosures

Cc: Craig Poundstone

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

364 Knollcrest Drive, Suite 101, Redding, CA 96002 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

1 STATE WATER RESOURCES CONTROL BOARD

2 DIVISION OF DRINKING WATER

3  
4 **Public Water System:** Willows Mobile Home Community and RV Park

5 **Water System No.:** 1100237

6  
7 **To:** Willows Mobile Home Community and RV Park

8 Attn: Richard Travassos

9 3511 Del Paso Road, Suite 160-240

10 Sacramento, CA 95835

11  
12 **Issued:** March 10, 2015

13 VIA CERTIFIED MAIL

14  
15  
16 **CITATION NO. 21-15C-025 FOR NONCOMPLIANCE**

17 **with Title 22 California Code of Regulations**

18 **Sections 64675 and 64690**

19  
20 Section 116650 of the California Health and Safety Code (CHSC) authorizes the  
21 issuance of a citation for failure to comply with a requirement of the California Safe  
22 Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with  
23 Section 116270), or any regulation, standard, permit, or order issued thereunder.

24  
25 The State Water Resources Control Board, acting by and through its Division of  
26 Drinking Water (hereinafter "Division") and the Deputy Director for the Division,  
27 hereby issues a citation to Willows Mobile Home Community and RV Park for failure

1 to comply with Sections 64675 and 64690, Title 22, of the California Code of  
2 Regulations (CCR).

3  
4 **APPLICABLE AUTHORITIES**

5 Section 116650 of the CHSC states:

6  
7 *(a) If the department determines that a public water system is in violation*  
8 *of this chapter or any regulation, permit, standard, citation, or order*  
9 *issued or adopted thereunder, the department may issue a citation to*  
10 *the public water system. The citation shall be served upon the public*  
11 *water system personally or by certified mail. Service shall be deemed*  
12 *effective as of the date of personal service or the date of receipt of*  
13 *the certified mail. If a person to whom a citation is directed refuses to*  
14 *accept delivery of the certified mail, the date of service shall be*  
15 *deemed to be the date of mailing.*

16  
17 *(b) Each citation shall be in writing and shall describe the nature of the*  
18 *violation or violations, including a reference to the statutory provision,*  
19 *standard, order, citation, permit, or regulation alleged to have been*  
20 *violated.*

21  
22 *(c) A citation may specify a date for elimination or correction of the*  
23 *condition constituting the violation.*

24  
25 *(d) A citation may include the assessment of a penalty as specified in*  
26 *subdivision (e).*

1  
2 (e) The department may assess a penalty in an amount not to exceed  
3 one thousand dollars (\$1,000) per day for each day that a violation  
4 occurred, and for each day that a violation continues to occur. A  
5 separate penalty may be assessed for each violation.  
6  
7

8 Section 64675.5, Title 22, of the CCR states in relevant part:  
9

10 (a) A system shall conduct standard tap sampling for two  
11 consecutive periods; thereafter, tap sampling frequency may be  
12 reduced pursuant to section 64675 (General Requirements for  
13 Tap Sampling for Lead and Copper) as follows:  
14

15 (1) If a system has 90th percentile levels that do not exceed  
16 0.005 mg/L for lead and 0.65 mg/L for copper for two  
17 consecutive periods, it may reduce the sampling to once every  
18 three years at the reduced number of sites.  
19  
20

21 Section 64690.1, Title 22, of the CCR states in relevant part:  
22

23 Each system shall report the following within the first 10 days after the  
24 end of each period during which such sampling or monitoring was  
25 conducted:  
26

1 (a) For lead and copper tap sampling:

2  
3 (1) The results of all tap samples including the location of each  
4 site and the associated tier criteria from section 64676  
5 (Sample Site Selection);

6  
7 (2) The 90th percentile lead and copper concentrations calculated  
8 pursuant to section 64678 (Determination of Exceedances of  
9 Lead and Copper Action Levels); and

10  
11 (3) With the exception of the first period of tap sampling, an  
12 identification of any site that was not sampled during previous  
13 periods, along with an explanation of why the sampling site  
14 was changed;

15  
16 **STATEMENT OF FACTS**

17 The Willows Mobile Home Community and RV Park (Water System) is classified as a  
18 community water system serving approximately 150 people. Because the Water  
19 System meets a reduced lead and copper sampling frequency, it is required to collect  
20 five (5) lead and copper samples every three years according to Table 64675-A and  
21 section 64675.5 of Title 22. The Water System failed to collect and report lead and  
22 copper samples at the end of the triennial period in 2014. The last samples submitted  
23 to the Division were taken in October of 2011.

1 **DETERMINATIONS**

2 The Division has determined that the Water System violated Section 64675.5(a)(1)  
3 and Section 64690.1, Title 22, of the CCR, in that the Water System failed to collect  
4 and report triennial samples in 2014.

5  
6 **DIRECTIVES**

7 The Water System is hereby directed to take the following actions:

- 8
- 9 1. Comply with Section 64675.5, Title 22, of the CCR in all future monitoring  
10 periods.
- 11
- 12 2. **Conduct lead and copper monitoring from customer's taps in June,**  
13 **July, August, or September of 2015, and then again in June, July,**  
14 **August, or September of 2017. Thereafter, sampling may resume to**  
15 **triennial.** Samples shall be collected in accordance with the Lead and  
16 Copper Rule Sampling per Title 22, Section 64677. The analytical results  
17 must be reported to the Division by the 10<sup>th</sup> day of the month following the  
18 month in which the analysis was completed.
- 19
- 20
- 21 3. The Water System shall provide public notification (by inclusion in the **2014**  
22 **Consumer Confidence Report**) of the failure to sample lead and copper,  
23 as required by the Lead and Copper regulations.
- 24
- 25

26 All documents required by this Citation to be submitted to the Division shall be  
27 submitted to the following address:

Reese B. Crenshaw, P. E.  
Valley District Engineer  
Drinking Water Field Operations  
Division of Drinking Water  
State Water Resources Control Board  
364 Knollcrest Drive, Suite 101  
Redding, CA 96002  
(530) 224-4800

Nothing in this Citation relieves the Water System of its obligation to meet the requirements of Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

The Division reserves the right to make such modifications to this Citation, as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation and shall be effective upon issuance.

#### **FURTHER ENFORCEMENT ACTION**

The California SDWA authorizes the Board to: issue citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Board to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to

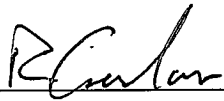
1 comply with an order of the Board; and to petition the superior court to take various  
2 enforcement measures against a public water system that has failed to comply with  
3 violates an order of the Board. The Board does not waive any further enforcement  
4 action by issuance of this citation.

5  
6 **PARTIES BOUND**

7 This Citation shall apply to and be binding upon the Water System, its officers,  
8 directors, agents, employees, contractors, successors, and assignees.

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10 **SEVERABILITY**

11 The directives of this Citation are severable, and the Water System shall comply with  
12 each and every provision thereof notwithstanding the effectiveness of any other  
13 provision.

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18 \_\_\_\_\_  
19 Reese B. Crenshaw, P.E., District Engineer  
20 Valley District  
21 Drinking Water Field Operations Branch  
22

3/9/15  
\_\_\_\_\_  
Date

